

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

Chapter 11

CIRCUIT CITY STORES, INC., et al.,

Case No.: 08-35653-KRH

Debtors.

**RESPONSE TO TWENTY-FIRST OMNIBUS OBJECTION TO CLAIMS
CENTURY PLAZA DEVELOPMENT CORPORATION
CLAIM 11669**

Century Plaza Development Corporation, a creditor in this bankruptcy case, by counsel, objects to the Debtors' Twenty-First Omnibus Objection to Claims, and states as follows:

1. Century Plaza Development Corporation ("Landlord") has a claim in the amount of \$1,959,982.56 for pre-petition rent and rejection damages in this bankruptcy case. This amount was claimed on its Proof of Claim filed on January 30, 2009, and amended on February 27, 2009 ("Claim"). The Claim arises from the rejection of an unexpired lease for non-residential real property.

2. A copy of the Proof of Claim, with the supporting statement of account but omitting large exhibits, is attached as Exhibit A.

3. The Objection contends that the claim "should be reduced by \$26,094.40 for pre-petition rent according to the Debtor's books and records." The Objection contained no explanation for this contention, and there is nothing on the landlord's books and records that corresponds with this allegation, much less supports it.

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4. According to the Objection, the Debtor's books and records contend that the rejection damages should be reduced by \$170,817.16. Nothing in the Landlord's books and records corresponds with this amount, nor with an amount multiplied by the 15% reduction from actual damages as used to calculate the Claim.

5. As provided in the Objection, because supporting documents were filed with the Claim, they are omitted from this filing, but are available upon request, other than the Exhibit described above.

6. The undersigned is the person to whom the attorneys for the Debtor should respond or with whom they should communicate regarding the claim and objection.

7. An additional person would acknowledge on behalf of the landlord as to the circumstances of the Claim, the amounts charges on it, and all payments and credits, is

Bobbie Sloan, Collection Manager
Century Plaza Development Corporation
1800 Willowpass Court
Concord, California 94520
Telephone: (925) 609 6200
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Email: bsloan@sierrapacifprop.com

WHEREFORE, Century Plaza Development Corporation moves this Court to overrule the Objection, to allow its claim for \$1,959,982.56, to award it its costs, expenses and attorneys' fees, and such other and further relief as this Court deems equitable and just.

CENTURY PLAZA DEVELOPMENT
CORPORATION

By: /s/ David A. Greer
David A. Greer, Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that the *Response to Twenty-First Omnibus Objection to Claims, Claim 11669*, was served by electronic service upon the persons on the service list and by facsimile and email to Lynn L. Tavenner and Jeffrey N. Pomerantz this 7th day of April, 2011.

_____/s/David A. Greer

David A. Greer

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